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Attorney for Defendant  
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:20-cr-00014-KJM
	)	
Plaintiff,	)	STIPULATION FOR TEMPORARY
	)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.	)	RELEASE; ORDER
	)	
BRYAN PAUL TAMBLYN,	)	Hon. Deborah Barnes
	)	
Defendant.	)	
	)	
	)	

The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to work in the driveway area of his residence, which is outside of the electronic monitoring zone, as follows:

Wednesday, May 20, 2020 from 8:00 a.m. to 5:00 p.m.

Thursday, May 21, 2020 from 8:00 a.m. to 5:00 p.m.

Mr. Tamblyn is currently on pretrial release in this district on a \$50,000 unsecured appearance bond, as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust).

Mr. Tamblyn is in compliance with his conditions of release. One of those conditions of

release is location monitoring. Mr. Tamblyn is subject to home detention, and therefore must remain inside his residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court ordered obligations; or other activities pre-approved by the pretrial services officer<sup>1</sup>.

Mr. Tamblyn's conditions were recently modified to permit him to work in his grandfather's driveway<sup>2</sup> on May 16, 2020 – May 18, 2020 from 8:00 a.m. to 5:00 p.m. *See* Dkt. 36. However, due to rainy weather on Sunday, May 17, 2020, Mr. Tamblyn's progress on the driveway project has been delayed. He therefore anticipates needing between one and a half and two more days of work to complete the project.

Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of Release be temporarily amended to specifically permit him to work in his grandfather's driveway, under his grandfather, Richard Espinosa's, supervision, for the period(s) of time set forth above.

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<sup>1</sup> Pretrial services interprets this condition to only permit their approval of other activities which are deemed "essential," with all other activities requiring the approval of the Court. The pretrial services officer who supervises Mr. Tamblyn advised defense counsel that this specific request would require the approval of the Court, because it is not considered an "essential" activity.

<sup>2</sup> Mr. Tamblyn's grandfather, Richard Espinosa, hopes to have his driveway repaved, and in order to do so needs a large amount of brush, debris, and portions of the existing driveway removed from the area. It will also be necessary to level the area and prepare it for the pouring of new cement. Mr. Tamblyn is experienced in this line of work and would like to complete the project for his grandfather, in order to save his grandfather the expense of hiring outside labor. Mr. Espinosa is a third party custodian and resides with Mr. Tamblyn, and will be present to supervise Mr. Tamblyn while he is working on the drive, outside of the electronic monitoring area.



**ORDER**

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that he is permitted to work in the driveway area of his residence, under the supervision of third party custodian Richard Espinosa, between the hours of 8:00 a.m. and 5:00 p.m. on Wednesday, May 20 – Thursday, May 21, 2020. At no time is Mr. Tamblyn to leave his residence. While in the front yard of his residence, Mr. Tamblyn shall be in the presence of his grandfather (Third-Party Custodian). All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

Dated: May 19, 2020

  
DEBORAH BARNES  
UNITED STATES MAGISTRATE JUDGE